

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

BRUCE MORRIS,
a/k/a "G,"

Defendant.

SUPERSEDING INDICTMENT

S2 24 Cr. 358 (JMF)

COUNT ONE

(Murder While Engaged in a Narcotics Conspiracy)

The Grand Jury charges:

1. On or about August 11, 2016, in the Southern District of New York and elsewhere, BRUCE MORRIS, a/k/a "G," the defendant, while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A), namely, the conspiracy to distribute and possess with intent to distribute 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," and one kilogram and more of mixtures and substances containing a detectable amount of heroin, charged in Count Four, intentionally and knowingly killed, and counseled, commanded, induced, procured, and caused the intentional killing of Jerome Jemison, a/k/a "Sal," in the vicinity of 868 Faile Street, Bronx, New York, and aided and abetted the same.

(Title 21, United States Code, Section 848(e)(1)(A);
Title 18, United States Code, Section 2.)

COUNT TWO
(Murder Through the Use of a Firearm)

The Grand Jury further charges:

2. On or about August 11, 2016, in the Southern District of New York and elsewhere, BRUCE MORRIS, a/k/a “G,” the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count Four of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and in the course of that crime caused the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111, to wit, MORRIS shot and killed Jerome Jemison, a/k/a “Sal,” in the vicinity of 868 Faile Street, Bronx, New York.

(Title 18, United States Code, Section 924(j)(1).)

COUNT THREE
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

3. From at least in or about 2014 through at least in or about 2023, in the Southern District of New York and elsewhere, BRUCE MORRIS, a/k/a “G,” the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count Four of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii), and 2.)

COUNT FOUR
(Conspiracy to Distribute Narcotics)

The Grand Jury further charges:

4. From at least in or about 2014 through at least in or about 2023, in the Southern District of New York and elsewhere, BRUCE MORRIS, a/k/a "G," the defendant, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

5. It was a part and an object of the conspiracy that BRUCE MORRIS, a/k/a "G," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substances involved in the offense were: (i) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

7. As a result of committing the offense alleged in Count Four of this Indictment, BRUCE MORRIS, a/k/a "G," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision


8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

FOREP


EDWARD Y. KIM
Acting United States Attorney